

Anti-Bribery Policy

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1. Introduction

This policy aims to establish the Fourfront Group, comprising Area, Area Europe, Sketch Studios and 360 Workplace, approach to issues of bribery and to set out the behaviour we expect of everyone either employed or engaged by us when conducting business on our behalf.

The Group expects its employees to demonstrate honesty, integrity and fairness in all aspects of their business dealings and exercise appropriate standards of professionalism and ethical conduct in all their activities. The Group expects the same approach to doing business from its business partners and suppliers.

The Group will not tolerate bribery or corruption in any form and has a 'zero tolerance' approach to any breach of this Policy. The Group and all its employees must follow this Policy and must not seek, accept or give a bribe, facilitation payment, or other improper or illegal payment.

The Group is committed to compliance with the Bribery Act 2010 and seeks to adhere to the requirements of ISO 37001:2016, Anti-Bribery Management Systems.

2. Definition

A Definition of Bribery: The receiving / offering / giving / providing / requesting / accepting of a financial or other advantage, in order, to seek to induce a person or to induce a person to give improper assistance in breach of their duty, or to otherwise influence someone with the underlying purpose of obtaining / retaining business, or an advantage in the course of business.

3. Policy Details

The Group will take appropriate steps to ensure that:

- 3.1 We do not, directly or indirectly, offer, promise, give, accept or demand a bribe (including excessive gifts and hospitality) in order to obtain or retain business, or gain any other improper advantage.

- 3.2 We do not offer, nor accept demands, to make illicit or illegal payments to intermediary agents, public officials or the employees of clients, business partners or anybody else that we do business with.
- 3.3 We will engage and remunerate intermediary agents and other third parties only for legitimate services and adopt appropriate transparency in our approach (as further detailed in this Policy, our Supplier Purchase Order Terms and our Client Terms and Conditions).
- 3.4 We promote employee awareness of, and compliance with, our Group policy against bribery and corruption through appropriate dissemination of our own procedures (including disciplinary procedures), as well as training programmes carried out both on induction and subsequently.
- 3.5 We adopt management control systems that discourage bribery and corruption, and adopt financial and tax accounting as well as auditing practices that prevent the establishment or concealment of illegal payments.
- 3.6 We raise awareness of the need to combat bribery and corruption with our business partners by publication of this Policy and (where appropriate) relevant contractual provisions and support initiatives designed to reduce the risk of bribery and corruption.

4. Responsibility

The policy is supported by all Directors within the Group and shall be reviewed annually. In particular: -

- 4.1 The provisions of the policy will be rigorously enforced, and any infringements could result in disciplinary action being taken under formal procedures including in the most serious cases dismissal from the Group, a police referral for criminal prosecution and a claim for recovery of loss or damage.
- 4.2 Directors are responsible for ensuring their staff are familiar with the contents of this Policy. An 'open door' policy is encouraged so that, if necessary, any queries and concerns can be brought to the attention of any Group Directors.
- 4.3 All staff should promptly report to a Group Director any illegal or un-ethical behaviour of which they become aware.

5. Gifts, Entertainment and Hospitality

We recognise that reasonable hospitality to meet, network and improve relationships with third parties is a normal part of business and is an acceptable company practice. Therefore, this policy does not prohibit normal and appropriate hospitality (given and received) to or from third parties.

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- it complies with local law.
- it does not include cash or a cash equivalent (such as gift certificates or vouchers).
- taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time.
- it is given openly, not secretly.
- it is approved first and added to the gifts and hospitality register.

6. Referral Fees

We recognise that a Group company may pay referral fees to a Third Party as part of its ordinary course of business. Our standard client terms and conditions, and our terms and conditions of purchase, confirm that such payments may be made. This Policy does not prohibit such payments, but such payments may only be made if the conditions below are met. If a payment is made which is prohibited by the below conditions, this will be in breach of this policy and the employee responsible may be subject to disciplinary conditions.

The following issues (not an exhaustive list) must be considered:

- the payment must (subject to the below) be paid to a third-party registered company (not an Employee of the third-party company).
- the payment may only be made directly to an employee of the third-party company with the express written permission of said company.
- the payment must relate to a particular service provided by the third-party company.
- payments in kind (for example a car, vouchers or a holiday) are prohibited.
- authority of a director of the relevant Group company (or where appropriate a person nominated by the directors of a Group company) must be obtained prior to any payment being made.

7. Red Flags

The following are examples of possible 'red flags' that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these (or any other) red flags while working for us, you must report them promptly to your Managing Director:

- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us.
- a third-party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or refuses to provide an invoice or receipt for a payment made.
- a third-party requests that payment is made to a country or geographic location different from where the third party resides or conducts business.
- a third-party requests an unexpected additional fee or commission to “facilitate” a service.
- a third-party demands (or offers) lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services.
- a third-party requests that a payment is made to “overlook” potential legal violations.
- you receive an invoice from a third party that appears to be non-standard or customised.
- a third party insists on the use of side letters or refuses to put terms agreed in writing.
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided.
- a third party requests or requires the use of a spouse, friend, relative, agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us.
- you are offered an unusually generous gift or offered lavish hospitality by a third party.

8. Further Information

If you have any questions regarding the Anti-Bribery Policy, please contact the People Team.



Gary Chandler
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